
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

PATRICE GRAY

Plaintiff,

v.

JUST ONE DIME, LLC; BRETT GEORGE; *et al.*
Defendants

§
§
§
§
§
§

Case Number:
1:22-CV-1105-ADA

JOINT STATUS REPORT OF THE PARTIES

TO THE HONORABLE JUDGE ALAN D. ALBRIGHT:

Per this Court's May 8, 2023 Order [Doc. 40], the Parties have the following Joint Status Report. (Note: for any Parties with whom an agreement on the language was not reached, counsels' signature lines are unsigned.)

JOD Interlocutory Appeal, JOD Bankruptcy¹, & JOD Adversary Action²

On May 24, 2024, Federal District Judge Robert Pitman issued an *Order* that the JOD Interlocutory Appeal is related to other matters before Federal District

¹ The shorthand title "**JOD Bankruptcy**" refers to *In re Just One Dime Coaching, LLC*, Case No. 22-10783-smr in the United States Bankruptcy Court, Western District of Texas, Austin Division.

² The shorthand title "**JOD Adversary Action**" refers to *Minns Firm Clients v. Danilo Varriale, et al.*, Adversary Action 23-01036-smr in the United States Bankruptcy Court, Western District of Texas, Austin Division.

Judge Alan Albright and would be reassigned to Judge Albright. [ECF 6, JOD Interlocutory Appeal].

The Status Hearing in the Adversary Action has been reset from June 12, 2024 to August 1, 2024 [docket entry of 6/14/24, Adversary Action]. The hope is to allow time for the potential resolution of the Interlocutory Appeal as this is anticipated to have a large impact on the Adversary Action.

Knierp Bankruptcy³

On June 5, 2024, Judge Robinson took the Motion to Sever the Knierp Bankruptcy from the Adversary Action under advisement.

There are two adversary actions opposing the dischargeability of debt that were filed on or before the deadline of June 10, 2024:

- *MLO Brands, LLC v. Travis Seth Knierp*, Adversary No. 24-01029-smr in the United States Bankruptcy Court for the Western District of Texas, Austin Division, and
- *Minns Firm Clients v. Travis Seth Knierp*, Adversary No. 24-01033-smr, in the United States Bankruptcy Court for the Western District of Texas, Austin Division

³ The “**Knierp Bankruptcy**” is *In re: Travis Seth Knierp and Kimberly Joy Knierp, Debtors*, Chapter 7, case no. 24-10253-cgb in the United States Bankruptcy Court, Western District of Texas, Austin Division.

On June 14, 2024, an Order of Discharge was issued for both Seth and Kimberly Kniep, except that it does not discharge debts that the bankruptcy court has decided or will decide are not discharged in the bankruptcy case [ECF 64, Kniep Bankruptcy].

Initial Federal District Court Cases

- Krichman Case⁴: On June 11, 2024, Plaintiffs filed *Plaintiffs' Emergency Motion for Order to Show Cause Why Defendant George Should Not Be Held in Contempt for Violating the Preliminary Injunctions* [ECF 49, Krichman Case].
- Gray Case⁵: On June 14, 2024, Plaintiffs filed *Plaintiff's Emergency Motion for Order to Show Cause Why Defendant George Should Not be Held in Contempt for Violating the Preliminary Injunction* [ECR 50, Gray Case].

Respectfully submitted on this 26th day of June, 2024.

/s/ Rain Minns Udall

Rain Levy Minns Udall
State Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd., Suite 500

⁴ The “**Krichman Case**” is *Krichman, et al. v. Just One Dime, LLC, et al.*, Case 1:22-cv-01146-ADA in the United States District Court, Western District of Texas, Austin Division.

⁵ The “**Gray Case**” is *Patrice Gray v. Just One Dime, LLC, et al.*, Case 1:22-cv-01105-ADA in the United States District Court, Western District of Texas, Austin Division.

Austin, Texas 78759-8583
(512) 372-3222
rain@rainminnslaw.com
Attorney in Charge for Plaintiff Gray

ONLY in the event of being signed below has the Party agreed to the content and form of this Status Update:

Gerard F. Bifulco
State Bar No. 24130269
Tim Cleveland
State Bar No. 24055318
Cleveland Krist PLLC
303 Camp Craft Road, Suite 325
Austin, Texas 78746
(737) 900-7103
gbifulco@clevelandkrist.com
tcleveland@clevelandkrist.com

*Counsel for Defendant Travis Seth Kniep
& Related Parties/Entities*

Bob Bragalone
State Bar No. 02855850
Reese Wade
State Bar No. 24100024
Gordon Rees Scully Mansukhani, LLP
2200 Ross Ave, Suite 3700
Dallas, TX 75201-2794
(214) 231-4740
bbragalone@grsm.com
rewade@grsm.com

*Counsel for Defendant Brett George and
Related Parties/Entities*

And counsel for the bankruptcy trustee in the Chapter 7 bankruptcy of Just One Dime Coaching, LLC, Case No. 22-10783-smr, in the Western District of Texas, Austin Division:

/s/ Jay Ong signed by permission

Jay Ong
State Bar No. 24028756
Munsch Hardt Kopf & Harr, P.C.
Hartland Plaza
1717 West 6th Street, Suite 250
Austin, Texas 78703
(512) 391-6124
jong@munsch.com

CERTIFICATE OF CONFERENCE

On June 17, 2024, I contacted counsel for the Defendants and the Bankruptcy Trustee to confer on this Status Update. As of June 25, 2024, the only response we received was from the Bankruptcy Trustee's counsel.

/s/ Rain Minns Udall

Rain Levy Minns Udall
Attorney in Charge for Plaintiff Gray

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record via the Court's CM/ECF system on the 26th day of June, 2024.

/s/ Rain Minns Udall

Rain Levy Minns Udall
Attorney in Charge for Plaintiff Gray